## CHRISTENSEN JAMES & MARTIN, CHTD.

Daryl E. Martin, Esq. (6735) Wesley J. Smith, Esq. (11871) 7440 W. Sahara Avenue Las Vegas, Nevada 89117 Telephone: (702) 255-1718

Facsimile: (702) 255-0871

dem@cjmlv.com, wes@cjmlv.com

Attorneys for Plaintiffs Board of Trustees of the Painters & Floorcoverers Joint Committee, et al.

## UNITED STATES DISTRICT COURT DISTRICT OF NEVADA

BOARD OF TRUSTEES OF THE PAINTERS AND FLOORCOVERERS JOINT COMMITTEE; et al.,

Plaintiffs,

VS.

1

5

6

7

8

9

10

11

12

13

14

15

16

17

18

19

20

21

22

23

24

25

26

27

28

OLYMPUS AND ASSOCIATES, INC. dba OLYMPUS PAINTING & SANDBLASTING, a Nevada corporation, *et al.*,

Defendants.

CASE NO.: 2:19-cv-00252-JAD-VCF

## STIPULATION AND ORDER TO EXTEND TIME FOR FILING JOINT PRETRIAL ORDER

[SECOND REQUEST]

ECF No. 47

Plaintiffs, the Board of Trustees of the Painters and Floorcoverers Joint Committee, *et al.* ("Plaintiffs" or "Trusts"), and Defendants Olympus and Associates, Inc. dba Olympus Painting & Sandblasting, George Tsiopos, Lazarus Tsiopos, and Great American Insurance Company ("Defendants") (collectively the "Parties"), each acting by and through their undersigned counsel, pursuant to the LR IA 6-1, hereby stipulate and agree as follows:

- 1. On July 28, 2021, the Settlement Conference was concluded without settlement and the case returned to the normal litigation track [ECF No. 46].
- 2. Pursuant to the Parties' request at the Settlement Conference, the deadline for the proposed Joint Pretrial Order was set for September 10, 2021 [ECF No. 46].
- 3. The Parties are actively working on the proposed Joint Pretrial Order and have a substantial draft in progress.

1

- 4. However, the Parties still have considerable work to finalize the Joint Pretrial Order, including reviewing redline changes to the facts and law sections, reviewing proposed exhibits, and determining whether objections are necessary in any aspect.
  - 5. The Parties therefore request a three-week extension to the existing deadline.
- 6. Following the Parties' oral request for additional time at the Settlement Conference, this is the Parties' second request to extend the deadline to file the proposed Joint Pretrial Order.
- 7. Therefore, the Parties agree and respectfully request to extend the deadline for filing the proposed Joint Pretrial Order to Friday, October 1, 2021.

CHRISTENSEN JAMES & MARTIN, CHTD.

McDonald Carano

By: /s/ Wesley J. Smith
Wesley J. Smith, Esq.
Nevada Bar No. 11871
Attorneys for Board of Trustees of the
Painters & Floorcoverers Joint
Committee, et al.

Dated: September 9, 2021

By: /s/ Philip Mannelly
Philip Mannelly, Esq.
Nevada Bar No. 14236
Attorneys for Olympus and Associates,
Inc. dba Olympus Painting &
Sandblasting, George Tsiopos, Lazarus
Tsiopos, and Great American Insurance
Company

Dated: September 9, 2021

## IT IS SO ORDERED.

U.S. District Judge Jennifer A. Dorsey Dated: September 12, 2021

SUBMITTED BY:

23

24

25

26

27

28

CHRISTENSEN JAMES & MARTIN

By: /s/ Wesley J. Smith
Wesley J. Smith, Esq.
Attorneys for Plaintiffs